

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
RACHEL MARIE HIREL	:	
Debtor	:	CHAPTER 13
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	CASE NO. 5-24-bk-03254
	:	
RACHEL MARIE HIREL	:	
Respondent	:	

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 27th day of January 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

1. Failure to properly state the liquidation value in Section 1B of the Plan (once the proper value of Debtor's home is listed).
2. Debtor(s)' Plan violates 11 U.S.C. §1325(a)(4) in that the value of property to be distributed under the Plan on account of each allowed unsecured claim is less than the amount that would be paid on such claim if the estate were liquidated under Chapter 7. More specifically, Debtor has access to non-exempt equity in the following:
 - a. Residential real estate. Trustee requests a full appraisal. The Debtor provided an unsigned and vague Comparative Market Analysis prepared by Realtor Keri Best that provides a value significantly lower than what is listed on readily-available online sources.
3. Schedule I lacks description, specifically, the non-filing spouse's income is not listed.
4. Trustee avers that Debtor(s)' Plan cannot be administered due to the lack of the following:
 - a. Debtor(s) has not provided to Trustee pay stubs for the month(s) of December 2024 and January 2025 for the non-filing spouse.

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WHEREFORE, Trustee alleges and avers that Debtor(s)' Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- b. Deny confirmation of Debtor(s)' Plan.
- c. Dismiss or convert Debtor(s)' case.
- d. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 27th day of January 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

JOHN FISHER
126 SOUTH MAIN STREET
PITTSTON, PA 18640-

/s/Tammy Life
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee